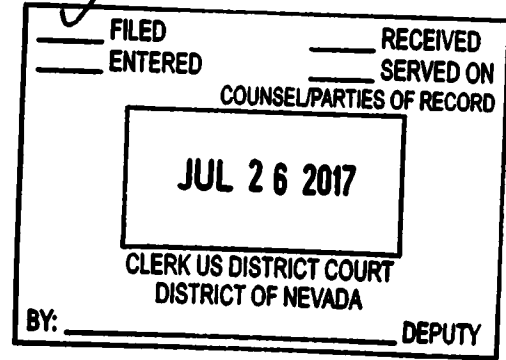


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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

3:17-CR-0062-LRH-VPC

UNITED STATES OF AMERICA,

Plaintiff,

v.

PETER JAMES CARIANI,

Defendant.

INDICTMENT FOR VIOLATIONS OF:

TITLE 18, UNITED STATES CODE,
SECTION 1832(a)(2) – Theft of Trade Secrets
(Count One)

TITLE 18, UNITED STATES CODE,
SECTION 1832(a)(2) – Transmission of Stolen
Trade Secrets (Count Two)

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Theft of Trade Secrets)

On or about April 7, 2015, in the District of Nevada, PETER JAMES CARIANI, defendant herein, with the intent to convert a trade secret that is related to a product and service used in and intended for use in interstate and foreign commerce, namely, information relating to the Sierra Nevada Corporation's Radar Enhanced Vision Systems (REVS) project, to the economic benefit of persons other than the trade secret's owner, the Sierra Nevada Corporation, knowing and intending that the offense would injure the Sierra Nevada Corporation, did knowingly without authorization copy, duplicate, download, and replicate such information; all in violation of Title 18, United States Code, Section 1832(a)(2).

COUNT TWO
(Transmission of Stolen Trade Secrets)

On or about May 1, 2015, in the District of Nevada, PETER JAMES CARIANI, defendant herein, with the intent to convert a trade secret that is related to a product and service used in and intended for use in interstate and foreign commerce, namely, information relating to the Sierra Nevada Corporation's Radar Enhanced Vision Systems (REVS) project, to the economic benefit of persons other than the trade secret's owner, the Sierra Nevada Corporation, knowing and intending that the offense would injure the Sierra Nevada Corporation, did knowingly without authorization transmit, deliver, send, mail, communicate, and convey such information from the State of Nevada to the State of Florida; all in violation of Title 18, United States Code, Section 1832(a)(2).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

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